

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re:	:	Case No: 13-55804
	:	
John Richard Jackson Jr.	:	Chapter 13
Kimberly Ann Jackson	:	
Debtors	:	Judge C. Kathryn Preston

MOTION TO MODIFY PLAN POST-CONFIRMATION

Now come Debtors, by and through counsel, pursuant to Local Rule 3015-2(b) and respectfully request this Court to modify their plan to decrease the monthly payment to \$920.00 per month. Debtors' reasons are set forth more fully below.

Respectfully submitted,

/s/ Katharine R. Granger
Katharine R. Granger (0079143)
3757 Attucks Drive
Powell, OH 43065
Attorney for Debtors
(614) 389-4941 Telephone
(614) 389-3857 Facsimile
kgranger@granger-law-firm.com

MEMORANDUM IN SUPPORT

This case was filed on July 23, 2013 and confirmed on October 17, 2013. Pursuant to Local Rule 3015-2(b), the following information is provided for this Court's consideration:

1. Plan section A(1) is being modified to decrease the monthly plan payment to \$920.00 per month, commencing with the March 1, 2015 payment. The dividend to unsecured creditors IS changing; it will decrease to 30%. It is anticipated that the plan will complete in a total of 60 months. These are above median income debtors with an applicable commitment period of 60 months.
2. The modification proposed by the debtors will modify the rights of the holders of any secured claim being dealt with under the plan, and will modify the rights of the holders of unsecured claims to the extent that the time of payment of their respective claims may be extended and the unsecured creditors will receive a reduced dividend.

2. The original plan was confirmed on October 17, 2013 as a 61% plan. The plan has not been previously modified.
3. The dividend to unsecured creditors is changed; it will decrease to 30%. The length of the plan will be approximately 60 total months. Debtor's income has decreased and the living expenses for Debtors have changed, therefore Debtors are finding it difficult to make the current Chapter 13 payment.
4. Plan Section C(2) shall be modified as follows: The monthly payment to Credit Acceptance shall decrease to \$230.00 per month until paid in full, beginning March 1 2015.
5. Plan Section C(2) shall be modified as follows: The monthly payment for Americredit Financial Services shall decrease to \$440.00 per month until paid in full, beginning March 1 2015.
6. This motion is for a permanent modification of the Chapter 13 plan, therefore, Amended Schedules I and J are attached hereto as Exhibit A.

For the reasons set forth herein, Debtors respectfully request this Court to modify the plan to decrease the monthly payment to \$920.00 per month, commencing with the March 1, 2015 payment.

Respectfully submitted,

/s/ Katharine R. Granger
Katharine R. Granger (0079143)
3757 Attucks Drive
Powell, OH 43065
Attorney for Debtors
(614) 389-4941 Telephone
(614) 389-3857 Facsimile
kgranger@granger-law-firm.com

Debtors Verification

We declare under penalty of perjury that we have read the attached amendments and that they are true and correct to the best of our knowledge, information or belief.

Date: 02/27/15

/s/ John Richard Jackson Jr.
Debtor

/s/ Kimberly Ann Jackson
Debtor

**UNITED STATES BANKRUPTCY COURT
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	:	
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Kimberly Ann Jackson	:	
Debtors	:	Judge C. Kathryn Preston

**CERTIFICATE OF SERVICE AND NOTICE OF RIGHT TO RESPOND WITHIN 21
DAYS**

Debtors have filed a Motion to Modify their Plan Post-Confirmation with the Court.

Your rights may be affected.

You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion/objection, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the motion/objection**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to:

170 North High Street, Columbus, Ohio 43215

OR your attorney must file a response using the court's ECF System.
The court must **receive** your response on or before the date above.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:

Katharine Granger, 3757 Attucks Drive, Powell, OH 43065
Office of the U.S. Trustee, 170 N. High Street, Suite 200, Columbus, Ohio 43215

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim and may enter an order granting the relief requested.

The undersigned certifies that a copy of the attached Motion to Modify Plan Post-Confirmation was served on this **2nd day of March 2015** by ordinary US mail and/or electronically this date on the parties whose names and full addresses are listed below and for NOTICE that the attached Motion to Modify Plan Post-Confirmation has been filed.

/s/Katharine Granger
Katharine Granger (0079143)
Attorney for Debtors

SERVED ELECTRONICALLY:

Frank M. Pees
Standing Chapter 13 Trustee
130 E. Wilson Bridge Road, Suite 200
Worthington, Ohio 43085-6300

U.S. Trustee
170 N. High Street, Suite 200
Columbus, Ohio 43215

Brian M Gianangeli
6305 Emerald Parkway
Dublin, OH 43016

SERVED VIA ORDINARY MAIL:

Attached List excluding US Trustee, Katharine Granger, Brian M Gianangeli
and Frank Pees

Label Matrix for local noticing

AEP

PO Box 24418

Canton, OH 44701-4418

AFNI

PO Box 3097

Bloomington, IL 61702-3097

0648-2

Case 2:13-bk-55804

Southern District of Ohio

Columbus

Mon Mar 2 12:04:04 EST 2015

Aarons

1159 Columbus Pike

Delaware, OH 43015-2713

(p)AMERICREDIT

PO BOX 183853

ARLINGTON TX 76096-3853

Apelles

PO Box 1197

Westerville, OH 43086-1197

Aspire Resources Inc

on behalf of US Department of Education

6775 Vista Drive

West Des Moines IA 50266-9305

Asst US Trustee (Col)

Office of the US Trustee

170 North High Street

Suite 200

Columbus, OH 43215-2417

Bank of America

45 American St.

#SV416

Simi Valley, CA 93065

Buckeye Lending Solutions

140 S. SanduskyStreet

Delaware, OH 43015-2303

CBCS

PO Box 164089

Columbus, OH 43216-4089

(p)COLUMBIA GAS

290 W NATIONWIDE BLVD 5TH FL

BANKRUPTCY DEPARTMENT

COLUMBUS OH 43215-4157

Cardinal Orthopaedic Institute

170 Taylor Station Road

Columbus, OH 43213-4491

Cavalry Portfolio

9522 E. 47th Place

Suite H

Tulsa, OK 74145-7211

Cavalry Portfolio Services

500 Summit Lake Drive, Ste 400

Valhalla, NY 10595-2322

(p)CHOICE RECOVERY INC

1550 OLD HENDERSON ROAD

STE 100

COLUMBUS OH 43220-3662

City of Columbus

PO Box 182882

Columbus, OH 43218-2882

Coast to Coast Financial Solutions

PO Box 2086

Thousand Oaks, CA 91358-2086

Computer Credit Corporation

2242 S. Hamilton Road

Suite 101

Columbus, OH 43232-4300

Consolidated Electric Co-Opertive

RBC Inc

PO Box 1548

Mansfield OH 44901-1548

(p)CREDIT ACCEPTANCE CORPORATION

25505 WEST 12 MILE ROAD

SOUTHFIELD MI 48034-8316

Credit Collection Services

Two Wells Ave.

Newton Center, MA 02459-3246

Credit Protection Association

13355 Noel Road

Suite 2100

Dallas, TX 75240-6837

First Premier Bank

601 S. Minnesota Avenue

Sioux Falls, SD 57104-4868

Focus Managment

5001 W. Lemon St.

Tampa, FL 33609-1103

GM Financial

PO Box 183834

Arlington, TX 76096-3834

General Medical Consultants

7277 Smiths Mill Road

Suite 250

New Albany, OH 43054-8196

Brian M Gianangeli

6305 Emerald Parkway

Dublin, OH 43016-3241

Grady Memorial Hospital

561 West Central Avenue

Delaware, OH 43015-1489

Katharine R Granger

3757 Attucks Drive

Powell, OH 43065-6080

HRRG
PO Box 189053
Fort Lauderdale, FL 33318-9053

John Richard Jackson Jr.
4860 Veley Road
Delaware, OH 43015-8792

Kimberly Ann Jackson
4860 Veley Road
Delaware, OH 43015-8792

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Joint Implant Surgeons
PO Box 712185
Cincinnati, OH 45271-2185

Keybridge
2348 Baton Rouge Avenue
Lima, OH 45805-1167

Kingwood Memorial Park
8230 Columbus Pike
Lewis Center OH 43035-9410

Kyle Cooper Esq.
3000 Vernon Place
Cincinnati, OH 45219-2418

LTD Financial Services
7322 Southwest Freeway
Suite 1600
Houston, TX 77074-2134

Meade & Associates
737 Enterprise Drive
Westerville, OH 43081-8841

Monroe & Main
1112 7th Avenue
Monroe, WI 53566-1364

Monroe & Main
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

Mount Carmel Health System
PO Box 89458
Cleveland, OH 44101-6458

Mt Carmel Health
Corporate Service Center
Customer Service 2nd Floor
6150 E Broad St
Columbus OH 43213-1574

NCO Financial Systems
507 Prudential Road
Horsham, PA 19044-2368

New Albany Orthopaedic
PO Box 713024
Cincinnati, OH 45271-3024

Northland Group
7831 Glen Roy Rd.
Minneapolis, MN 55439-3133

Ohio Department of Taxation
Bankruptcy Division
P.O. Box 530
Columbus, OH 43216-0530

Ohio Dept of Job & Family Services
Litigation Unit - Unemp Comp
PO Box 182404
Columbus, OH 43218-2404

Ohio Neighborhood Finance
268 S. Sandusky Street
Delaware, OH 43015-2647

Pathfinder Credit Services
4465 W. Gandy Blvd
Tampa, FL 33611-3380

Pathfinder Credit Services
PO Box 13769
Tampa, FL 33681-3769

Frank M Pees
130 East Wilson Bridge Road
Suite 200
Worthington, OH 43085-2391

Physiotherapy Corp.
PO Box 824181
Philadelphia, PA 19182-4181

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard/ Charter
P.O. Box 2208
Vacaville, CA 95696-8208

RBC Collections
283 Glessner Ave.
Mansfield, OH 44903-2224

(p)RBC
PO BOX 1548
MANSFIELD OH 44901-1548

Roadmaster Driving School
5411 West Tyson Ave.
Tampa, FL 33611-3227

Santander Consumer USA
8585 N Stemmons Fwy
Suite 1000
Dallas, TX 75247-3822

Seventh Avenue
1112 7th Avenue
Monroe, WI 53566-1364

Seventh Avenue
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

The Bureau
1717 Central Street
Evanston, IL 60201-1507

US Department of Education
PO Box 78601
Madison, WI 53707

US Department of Veterans Affairs
PO Box 5302.69
Atlanta, GA 30353

United Collection Bureau
PO Box 140190
Toledo, OH 43614-0190

United Collections
5620 Southwyck Blvd.
Toledo, OH 43614-1501

Van Ru Credit
PO Box 1084
Des Plaines, IL 60017-1084

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AmeriCredit Financial Services, Inc.
PO Box 183853
Arlington, TX 76096

(d)AmeriCredit Financial Services, Inc.
PO Box 183853
Arlington, Texas 76096

COLUMBIA GAS OF OHIO
200 CIVIC CENTER DR 11th Fl
COLUMBUS, OH 43215-4138

Choice Recovery
PO Box 20790
Columbus, OH 43220

(d)Columbia Gas
PO Box 742510
Cincinnati, OH 45274

Credit Acceptance
25505 West Twelve Mile Road
Southfield, MI 48034

(d)FFCC- Columbus Inc.
PO Box 20790
Columbus, OH 43220

Jefferson Capital Systems
PO Box 7999
Saint Cloud, MN 56302

(d)Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-9617

Portfolio Recovery
120 Corporate Blvd
Norfolk, VA 23502

Richland Bureau of Credits
283 Glessner Avenue
Mansfield, OH 44903

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Kingwood Memorial Park
8230 Columbus Pike
Lewis Center, OH 43035-9410

(u)Ohio Department of Taxation

(d)Ohio Department of Taxation
Bankruptcy Division
PO Box 530
Columbus, OH 43216-0530